



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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September 7, 2016

Honorable Sandra L. Townes (BY ECF)  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Brandon Hanson v. City of New York, et al., 15-cv-1447 (SLT) (JO)

Your Honor:

I represent defendants The City of New York, Romeo Francis and Kevin Golden in the above-referenced matter. I write on behalf of all parties to respectfully request a further two week extension of the remaining deadlines related to defendants' summary judgment motions in this matter. Counsel for all parties consent to this request.

As set forth in a letter to the Court from the undersigned dated August 29, 2016, plaintiff's counsel, Elizabeth Crotty, previously requested an additional two weeks for plaintiff to serve his oppositions to defendants City, Francis and Golden's motion for summary judgment and defendant Garcia's motion for partial summary judgment, due to a medical emergency. Your Honor granted that request and extended plaintiff's time to serve his opposition papers until September 15, 2016. Ms. Crotty has advised me that she will be undergoing surgery today related to the medical emergency and will require a lengthy recovery. She therefore requests an additional two weeks, until September 29, 2016, in which plaintiff may serve his opposition papers. Defense counsel consents to the requested further extension provided that defendants are afforded a similar extension in which to serve their replies.

Accordingly, the parties respectfully request the following revisions to the briefing schedule:

<u>Motion Papers</u>	<u>Current Due Date</u>	<u>Proposed Revised Due Date</u>
Opposition to summary judgment and partial summary judgment motions to be served	September 15, 2016	<b>September 29, 2016</b>

Hon. Sandra L. Townes, U.S.D.J.

September 7, 2016

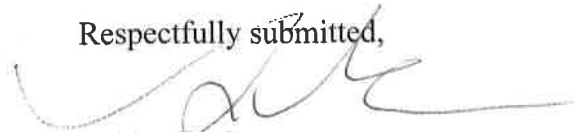
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Replies to be served, and all motion papers to be filed by the moving defendants	September 29, 2016	<b>October 13, 2016</b>
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No other previously-scheduled dates will be affected by the requested extension, as no other dates have been scheduled except for those discussed above.

The parties thank the Court for its consideration herein.

Respectfully submitted,



Ashley R. Garman  
*Senior Counsel*

cc: Elizabeth R. Crotty, Esq. **(By ECF)**  
*Attorney for Plaintiff*

Doug LaBarbera, Esq. **(By ECF)**  
*Attorney for Defendant Daniel Garcia*